

SC Talking Points June 2015

1. DEQ comprehensively applied the Joint Source Control Strategy, in collaboration with EPA, to identify, evaluate and control contaminant sources from the uplands to the river via groundwater, soil erosion and stormwater.
 - a) Groundwater source control measures are in place or planned for the groundwater plumes that present a potential to recontaminate river sediment.
 - b) Riverbanks with potential sources are either being addressed by DEQ efforts or will be integrated into the EPA in-water remedial program.
 - c) Stormwater contributions from ~50% of the drainage area are very clean, originating in Forest Park. Combined Sewer Overflows were controlled in 2000-2011. Stormwater source control evaluations were conducted at up to 170 sites following DEQ's Guidance for Evaluating the Stormwater Pathway at Upland Sites. Approximately 90 industrial sites manage on-going stormwater discharges under NPDES permits and another 90 are certified to have no exposure of industrial activities to stormwater. Such that the potential for sediment recontamination via stormwater is low and mechanisms are in place to adaptively manage on-going stormwater discharges.
2. Evaluation of the need for upland source control measures is substantially complete and controls are implemented or planned. Source control efforts to date have reduced the threat of recontamination by upland or upstream contaminants. Based on current information and when all planned actions are complete, the risk of recontamination will be reduced sufficiently to allow the in-water remedy to be implemented.
3. While source control can be an iterative process, plans and schedules are in place to complete the remaining needed source control measures at individual sites and demonstrate their long term effectiveness prior to implementation of the in-water remedy.
4. Going forward, DEQ and EPA will develop an integrated long-term monitoring and adaptive management plan to protect, identify and act on any emergent threats to sediment remedies from upland sources, once put in place.
5. The Source Control Summary Report informs development of EPA's Proposed Plan.
6. Updated report will be available to support public comment on EPA's Proposed Plan.